

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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D.H., N.H., K.H. f/k/a J.H., Natasha Martin, Tiffany Grissom, Rosa Gonzalez, Adrienne Bankston, and Sarah Marchando, individually and on behalf of a class of all others similarly situated;

NOTICE OF MOTION

16 Civ. 7698 (PKC)(KNF)

Plaintiffs,

-against-

The City Of New York, Sean Kinane, Joseph Mckenna, Kayan Dawkins, Thomas Keane, Maria Imburgia, Kevin Maloney, Joel Allen, Dave Siev, Bryan Pocalyko, Christopher Savarese, Thomas Diggs, Joel Gomez, Keith Beddows, Christian Salazar, Henry Daverin, Joseph Nicosia, Kelly Quinn, Alexis Yanez, Michael Doyle, John/Jane Doe NYPD Police Officers #1-14,

Defendants.

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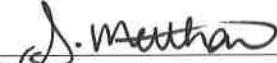
PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated September 27, 2017, the Declaration of Suzanna Publicker Mettham dated September 27, 2017, and upon all prior pleadings and proceedings had herein, defendants City, Sean Kinane, Joseph McKenna, Kayan Dawkins, Thomas Keane, Maria Imburgia, Kevin Maloney, Joel Allen, Dave Siev, Bryan Pocalyko, Christopher Savarese, Thomas Diggs, Joel Gomez, Keith Beddows, Christian Salazar, Henry Daverin, Joseph Nicosia, Kelly Quinn, Alexis Yanez, Michael Doyle (collectively “defendants”) will move this Court, before the Honorable Kevin N. Fox, United States Magistrate Judge, at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York, for an Order: (1) permitting plaintiffs to seal Exhibits 4 and 5 to plaintiffs’ August 30, 2017 motion, which contain the IAB Resumes for two Named Defendants, (2) permitting plaintiffs to seal Exhibit 11 to plaintiffs’ August 25,

2017 motion, which contains the disciplinary record of a Named Defendant, (3) permitting plaintiffs to seal Exhibit 15 to plaintiffs' August 25, 2017 motion, which contains a detailed list of law enforcement actions taken in a particular Patrol Borough, and (4) permitting both parties to file redacted versions of their respective August 30, 2017 and September 5, 2017 motions, to redact references to an unsubstantiated IAB allegation.

Dated: New York, New York
September 27, 2017

ZACHARY W. CARTER
Corporation Counsel of the
City of New York
Attorney for Defendants
100 Church Street, Room 3-212
New York, New York 10007
(212) 356-2356

By:



Suzanna Publicker Mettham
Senior Counsel
Special Federal Litigation Division

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| Docket No. 16 Civ. 7698 (PKC)(KNF) |
| UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK |
| D.H., N.H., K.H. f/k/a J.H., Natasha Martin, Tiffaney Grissom, Rosa Gonzalez, Adrienne Bankston, and Sarah Marchando, individually and on behalf of a class of all others similarly situated; |
| Plaintiffs, -against- |
| The City Of New York, Sean Kinane, Joseph Mckenna, Kayan Dawkins, Thomas Keane, Maria Imburgia, Kevin Maloney, Joel Allen, Dave Siev, Bryan Pocalyko, Christopher Savarese, Thomas Diggs, Joel Gomez, Keith Beddows, Christian Salazar, Henry Daverin, Joseph Nicosia, Kelly Quinn, Alexis Yanez, Michael Doyle, John/Jane Doe NYPD Police Officers #1-14, |
| Defendants. |
| NOTICE OF MOTION |
| <p style="text-align: center;">ZACHARY W. CARTER <i>Corporation Counsel of the City of New York</i> <i>Attorney for Defendants</i> <i>100 Church Street, Room 3-212</i> <i>New York, New York 10007</i></p> <p style="text-align: center;"><i>Of Counsel: Suzanna Publicker Mettham</i> <i>Tel: (212) 356-2356</i></p> |
| <p><i>Due and timely service is hereby admitted.</i></p> <p><i>New York, N.Y....., 2017</i></p> <p style="text-align: right;"><i>..... Esq.</i></p> <p><i>Attorney for.....</i></p> |